

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604-3590

Reply to the Attention Of: SR-6J

July 31, 2007

**Via E-mail and Hard Copy**

Mr. James Hutchens  
RMT, Inc.  
150 North Patrick Boulevard  
Suite 180  
Brookfield, WI 53045-5854  
Fax: 262.879.1220

RE: Work Plan and Field Sampling Plan  
12<sup>th</sup> Street Landfill, Kalamazoo River Superfund Site Operable Unit #04  
Plainwell, Michigan

Dear Mr. Hutchens:

The U.S. EPA has reviewed the Work Plan and the Field Sampling Plan for *12th Street Landfill, Kalamazoo River Superfund Site Operable Unit #04, Plainwell, Michigan*, dated June, 2007 (WP, FSP). At this time, U.S. EPA can not give approval to the FSP and the WP. U.S. EPA requires that certain changes and additions have been made before approval can be granted. Please update the sections of the FSP and WP to which the following comments are applicable and send copies of the revised plans to U.S. EPA. Additionally, please include with the revisions a cover letter with responses to the comments listed below or references the change(s) in the revised WP or FSP.

**Workplan**

**General Comments**

1. The document provides limited detail for the basis of the design. Subsequent documents should include detail on the activities that will be performed with data supporting planned activities. The follow information should also be provided in subsequent documents:
  - An evaluation of the data previously collected.



- The excess capacity of the landfill.
- Volume of waste to be added to the landfill.
- It appears that investigation derived waste from the Plainwell Mill site is being proposed for disposal in the 12<sup>th</sup> Street Landfill. As of our most recent discussion, it sounded like this scenario was unlikely. If 12<sup>th</sup> street is no longer the intended disposal location for Plainwell Mill materials, please make this clear.
- The 'OSC' acronym should be preceded by 'RMT.' This acronym is used to refer to U.S. EPA's On-Scene Coordinators, and some distinction should be made between RMT On-Site Coordinators and U.S. EPA's On-Scene Coordinators.

## Specific Comments

### 1. Figure 2

- a. The data collected and evaluated to determine the sediment removal area must be provided to verify the removal boundaries.
  - b. The label "APPROXIMATE LIMITS OF WASTE" noted on the figure does not point to a boundary.
  - c. The earthen section of the Plainwell Dam is not identified on the figure.
  - d. What coordinate system is being used?
2. **Section 4.1 Clearing and Grubbing** – The text refers to two (2) 100x100' areas on top of the landfill that will be used to construct pads for sediment and soil placement. Figure 2 shows two (2) 200x200' containment areas and a 100x100' water treatment area. The text and figure should be consistent.
  3. **Section 4.3 Sediment/Soil Containment Area** – Is the 3<sup>rd</sup> sentence referring to the existing cover? What is the depth of the existing cover?
  4. **Section 5 Portadam Placement and Dewatering** – Additional information should be provided on the intended use of the Portadam.
    - a. Has an evaluation of the sediment consistency and ability to support the Portadam been performed? What is the consistency of the sediments in the river bottom?
    - b. What is the typical range of river elevation? Are there any provisions being taken for flooding out of enclosed area in mid-excavation?
    - c. What allowances will be made at the pump discharge so that sediment outside of the Portadams is not disturbed due to scour?
  5. **Section 5 Portadam Placement and Dewatering** – Additional information should be provided on the turbidity monitoring for the decanted water.
    - a. What is the turbidity monitoring frequency?
    - b. What is the basis for the turbidity criteria of two times the upstream station?

6. **Section 6 Sediment/Soil Removal Operations** – Information should be provided on the construction of the pad potentially required for the excavator to reach further from shore. Will visual paper residuals be removed from the underlying sediments prior to the construction of the pad? What materials will the pad be constructed of and how will it be disposed of?
7. **Section 6 Sediment/Soil Removal Operations** – There is no mention of monitoring for PCBs in discharge water from dewatering the sediment. What will the discharge limits be?
8. **Section 8 Water Management** – What will the water capacity be in the containment area and in the tanks?

## **Field Sampling Plan**

### **General Comments**

1. This FSP does not appear to directly cover any sampling efforts. Prior to sampling, a complete description of the effort, including numbers of samples, types of analysis, and sample locations, should be provided.
2. There are numerous citations throughout the document; however, full references are not provided.
3. The MA-FSP can be applied to other areas of the Site, including Operable Unit No. 7, the Plainwell Mill, though only after an amendment or addendum. As such, I would recommend the editing of the following sections to remove mention of Operable Unit #7:
  - a. Section 1.4 (Page 3 of 23)
  - b. Section 2.1 (Page 7 of 23)
  - c. Section 3.1.1 (Page 12 of 23)

### **Specific Comments**

1. **Table 2-1** – Sample parameters and frequencies should be identified for each type of sample.
2. **Section 3.1 Sample Designation** – Please verify that the sample numbering system presented in Section 3.1 is consistent with the existing Kalamazoo River Database requirements to allow others the ability to utilize the data if needed.
3. **Section 3.1 Sample Designation** – With the proposed sampling number system, it appears there could be duplicate numbers for samples if multiple sampling events take place. How will samples be differentiated if there are multiple sampling events?

4. **Section 3.1.3 Sample Number** – The example sample designation provided begins with “WY”. Section 3.1 identifies that the sample designations begin with the sample location. The placement of “WY” before the sample location is not consistent with the naming convention provided in this document.
5. **Section 3.1.4 Sample Date** – Both the sample date and time should be included in field logbooks.
6. **Section 3.2 Sample Containers and Preservation** – Sample containers should also be labeled with the sample date and time in accordance with Section 3.1.
7. **Section 4.2 Selection of Parameters** – The text states that the number and location of samples are summarized in Table 2-1 and Worksheets #17 and #18 in Appendix C. Turbidity monitoring in surface water is only defined as periodic. The frequency of turbidity monitoring should be defined.
8. **Section 4.2 Selection of Parameters** – Further detail for monitoring all discharge parameters should be provided with a process for modifying the treatment if criteria are exceeded.
9. **Section 4.4.1 Field Measurements** – Field calibration frequencies are identified in QAPP Worksheet #22. A calibration check of field measurements should also be performed on a daily basis. If the calibration drifts, an entire weeks worth of data could be lost before the problem is identified.
10. **Section 4.4.4 Analytical Quality Assurance Considerations** – Discrepancies were identified between the text in this section and QAPP Worksheet #20.
  - a. **Field Equipment Blanks** – The text identifies “field equipment blank” and “field equipment duplicate”. Please clarify the description and resolve the discrepancy with QAPP Worksheet #20 which states the frequency is TBD.
  - b. **Field Equipment Blanks** – The text identifies that one equipment blank will be generated for each location sampled for low-level mercury. This analysis is not included in QAPP Worksheet #20.
  - c. **Trip Blanks** – Trip blanks are listed in the text but not in QAPP Worksheet #20.
  - d. **Field Blanks** – The text identifies that one field blank will be generated for every 10 primary samples. QAPP Worksheet #20 identifies the frequency as TBD.
11. **Section 5 Field Physical Measurements** – The text includes a description of how staff gauges will be surveyed; however, there is no description of how or where the staff gauge will be installed.
12. **Section 6 Management of Investigation-Derived Waste** – It appears that investigation derived waste from the Plainwell Mill Site is proposed to be disposed of at the 12<sup>th</sup> Street Landfill. Are there plans to dispose of wastes from other locations at the 12<sup>th</sup> Street Landfill? Is this allowed under the CD?

Please do not hesitate to me at the below-listed number if you have any questions regarding this letter or require any clarification of the comments listed above.

Sincerely,

Michael Berkoff  
Remedial Project Manager  
U.S EPA, Superfund Division  
(312) 353-8983

cc via email: S. Borries, U.S. EPA  
J. Saric, U.S. EPA  
S. Chummar, U.S. EPA  
L. Schmidt, U.S. EPA  
M. Mankowski, U.S. EPA  
E. Furey, U.S. EPA  
J. Haile, Weyerhauser  
K. Krawczyk, MDEQ